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suborbital tracking and data systems, and satellite-based remote sensing and communications systems. Orbital thus is qualified to address several of the technical issues raised in the DARS NPRM.

As an initial matter, Orbital can confirm the Commission's expectation that the implementation of DARS will stimulate the economy by the creation of jobs in numerous sectors.^{2/} The construction, launch and operation of the satellites will help ensure that the U.S. satellite industry remains the world leader. Extensive work will emerge for the satellite manufacturers in constructing the satellites for the various DARS systems, and the launch industry will likewise be benefitted by the need to deploy multiple satellites into orbit.

In addition, the necessary terrestrial facilities, including the earth stations for communicating with and controlling the satellites, will need to be constructed and operated. Equally important, Orbital expects a significant market to develop for the subscriber receivers. Thus, Orbital expects a significant initial boost of activity (and employment), and also anticipates an ongoing need for employment to support the satellite operations and the manufacture of receivers.^{3/}

^{2/} DARS NPRM at ¶ 5.

^{3/} Orbital also believes that employment will expand in the "content" sector, to the extent that additional programming will need to be created for this new audio outlet. As the Commission observes, the national reach of the satellites could support currently unserved or underserved markets, including niche programming such as foreign language programs and programming geared towards children or senior citizens. DARS NPRM at ¶ 2.

With respect to the subscriber receivers, Orbital has evaluated the proposed service characteristics and required capabilities of the receivers. Through its Magellan Systems Corporation subsidiary, Orbital currently serves as a leading designer, manufacturer and distributor of low-cost satellite-based communications and navigation products for consumers. Magellan distributes its consumer products, ranging in price from \$200 to \$1,000, to a wide variety of retailers including K-Mart, Wal-Mart, L.L. Bean, West Marine and Cabelas in nearly 8,000 locations worldwide. Magellan has extensive experience in designing and manufacturing low-cost satellite navigation receivers that use the global positioning system (GPS) and communicators for the low-Earth orbit systems currently under development. This experience is directly transferable to the development and low-cost manufacture of digital audio radio equipment. In light of this experience, Orbital believes that DARS receivers can be manufactured at attractive consumer prices, and therefore expects the new service to enjoy rapid and sustained growth.


Finally, Orbital supports the Commission's proposal to allow the DARS systems to provide ancillary services.^{4/} The ability to offer ancillary services will allow the DARS systems to make full use of the space segment, thereby enhancing the economic attractiveness of DARS. This is particularly important in the earlier phases of deployment while the subscriber base is

^{4/} DARS NPRM at ¶¶'s 29-30.

growing. Orbital believes that it would take advantage of potential ancillary services in order to enhance its own present satellite communication and remote imaging services.

For all of the foregoing reasons, Orbital supports the Commission's proposal to adopt licensing and service rules for satellite-delivered digital audio radio services.

Respectfully submitted,



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